DOMICILE—CHANGE—INTENT.—Where complainant's domicile of origin was Newport, R. I., where she and her ancestors had lived for more than two generations, where she owned a house and had always claimed her residence, and where she and her husband paid personal taxes and her husband was buried and his will probated, the fact that she also acquired residences in New Hampshire and Massachusetts in each of which she lived portions of the year, remainder of the time in Newport, even though six months of the time in Massachusetts: *Held,* not sufficient to establish a change of domicile to Massachusetts. *Dunn* v. *Trefry,* (C. C. A., 1st Circ., 1919) 260 Fed. 147.

It is universally agreed that a change of domicile requires both the act or fact of transfer of bodily presence from the old place of abode to the new, and the concurring intention to abandon the old domicile and gain the new one. For strong cases where the intent alone was insufficient, see *Casey's Case,* 1 Ashmead 126; *Penfield* v. *Chesapeake R. R. Co.,* 29 Fed. Rep. 494. For strong cases where long and continuous actual residence failed to accomplish a change of domicile, see *Collier* v. *Rivaz,* 2 Curt. Eccl. 855; *Dupuy* v. *Wurtz,* 53 N. Y. 556. In the principal case, on the facts above stated, plus other facts showing contingent intent to reside in Massachusetts, Anderson, J., in the lower court, found that complainant was domiciled in Boston, because he thought for all legal purposes this remote contingency was unimportant. The reviewing court, finding facilities for residence in Rhode Island, found the contingency obscured the clear intent necessary to change domicile, and declined to find the requisite intent to change domicile. Of these two different conceptions of the facts necessary to base an inference of intent, that of the Circuit Court of Appeals seems most clearly in harmony with the classic idea of intent—intent to abandon the old domicile with concurrent intent to gain a new domicile, because as long as there is doubt in one's mind as to giving up old domicile completely, the old legal idea of intent is not fulfilled. See further, *Gilman* v. *Gilman,* 83 Am. Dec. 502; JACOBS, LAW OF DOMICILE, Sec. 125, 126; 23 HARV. L. REV. 211; 9 HARV. L. REV. 544.

FALSE STATEMENTS—RESULTING NERVOUS SHOCK—LIABILITY FOR.—In an action on the case for damages for illness resulting from a nervous shock induced by false words and threats on the part of the defendant. *Held,* that the defendant was liable. *Janvier* v. *Sweeney,* [1919] 2 K. B. 316.

Awarding damages for bodily harm resulting from a nervous shock brought about by spoken words is comparatively novel and but few cases have been decided on the point. The decision in the principal case was based almost entirely on *Wilkinson* v. *Downton* [1897] 2 Q. B. 57, where the defendant, as a practical joke, informed the plaintiff that the latter's husband had met with a serious accident. Severe illness resulted from the shock and the plaintiff was permitted to recover. Wright, J., in deciding the case, made the statement, "it must be admitted that the present case is without precedent." Several intervening cases, notably *Dulieu* v. *White and Son's,* [1901] 2 K. B. 669, approved *Wilkinson* v. *Downton, supra,* but none of these